



United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 26, 2023

By ECF

The Honorable Barbara C. Moses
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Project South et al. v. United States Immigration and Customs Enforcement et al.*,
21 Civ. 8440 (ALC) (BCM)

Dear Judge Moses:

This Office represents U.S. Immigration and Customs Enforcement, the U.S. Department of Homeland Security, U.S. Citizenship and Immigration Services, the U.S. Department of Justice Executive Office for Immigration Review, and the U.S. Department of State (collectively, “Defendants” or the “Government”), in the above-referenced case filed under the Freedom of Information Act (“FOIA”), 5 U.S.C. §§ 552 *et seq.* The Government respectfully requests leave to file excess pages for the memorandum of law in support of the motion for summary judgment, to be filed by today, May 26, 2023.

Pursuant to Rule 2(h) of the Court’s Individual Practices, principal memoranda of law are limited to 25 pages, and reply memoranda are limited to 10 pages absent advance permission. Due to the multiple agencies at issue the Government respectfully requests that it be granted five additional pages for its principal memorandum of law, and that Plaintiffs be granted the same for their principal memorandum of law in opposition and in support of any cross-motion.

Plaintiffs consent to this request.

I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of Record
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